

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

JASON CANTRELL #397429,

Plaintiff,

NO. 1:18-cv-1163

v

HON. GORDON J. QUIST

MICHIGAN DEPARTMENT OF  
CORRECTIONS, ANTHONY HEILIG,  
and SCOTT ARP,

MAG. PHILLIP J. GREEN

Defendants.

---

Dan Manville (P39731)  
Attorney for Plaintiff  
Civil Rights Clinic  
MSU College of Law  
P.O. Box 1570  
East Lansing, MI 48823  
(517) 913-9690  
daniel.manville@law.msu.edu

---

Josh Marcum (P68244)  
Assistant Attorney General  
Attorney for MDOC Defendants  
Michigan Department of Attorney General  
MDOC Division  
P.O. Box 30217  
Lansing, MI 48909  
(517) 335-3055  
Marcumj1@michigan.gov

---

**MDOC DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants, Anthony Heilig and Scott Arp, by and through counsel, bring their motion pursuant to Fed. R. Civ. P. 56(a) and respectfully request this Court dismiss all claims against them for the reasons set forth in their accompanying brief. Under Local Rule 7.1(d), undersigned counsel certifies that he emailed counsel for Plaintiff on September 23, 2020 notifying counsel that this motion would be filed on September 28, 2020 and concurrence was not given.

Respectfully submitted,

Dana Nessel  
Attorney General

s/ Josh Marcum  
Josh Marcum (P68244)  
Assistant Attorney General  
Attorney for MDOC Defendants  
MDOC Division  
P.O. Box 30217  
Lansing, MI 48909  
(517) 335-3055  
[marcumjl@michigan.gov](mailto:marcumjl@michigan.gov)  
P68244

Date: September 28, 2020

Marcum\Cantrell 2018-0238395-B\Mot for SJ

**CERTIFICATE OF SERVICE**

I hereby certify that on **September 28, 2020**, I electronically filed  
**MDOC DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** with the  
Clerk of the Court using the ECF system which will send notification of such filing.

s/ Josh Marcum  
JOSH MARCUM (P68244)  
Assistant Attorney General  
[marcumjl@michigan.gov](mailto:marcumjl@michigan.gov)  
P68244